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7 *Attorneys for Defendant NETFLIX, INC.*

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

11 LAURI VALJAKKA,  
12 Plaintiff,  
13 v.  
14 NETFLIX, INC.,  
15 Defendant.

Case No. 4:22-cv-01490-JST

DEFENDANT NETFLIX, INC.'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED [LAMKIN DECLARATION ISO  
UNOPPOSED MOTION TO MODIFY  
THE SCHEDULING ORDER]

**I. INTRODUCTION**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Netflix, Inc. (“Netflix”) hereby submits this administrative motion to consider whether material produced by non-party AiPi, LLC (“AiPi”) should be sealed. The declaration of Rachael Lamkin in support of Netflix’s Unopposed Motion to Modify the Scheduling Order and certain exhibits thereto include or describe documents that AiPi has produced to Netflix that are designated CONFIDENTIAL pursuant to the Stipulated Protective Order Regarding the Disclosure and Use of Discovery Materials (ECF No. 56) (“Protective Order”) (see Declaration of Elise Edlin in Support of Administrative Motion, filed herewith). Specifically, based on AiPi’s designations, Netflix seeks to seal:

Document	Entirety Or Redacted
Declaration of Rachael Lamkin	Highlighted Redactions: • 4:3-27
Exhibits G through J to the Lamkin Declaration in Support of Unopposed Motion to Modify the Scheduling Order	Entirety

**II. STATEMENT OF COMPLIANCE**

Netflix has reviewed and complied with the Standing Order Governing Administrative Motions to File Materials Under Seal Before District Judge Jon S. Tigar. Netflix has also reviewed and complied with Civil Local Rule 79-5, including the requirement to file separate motions if a party seeks to file under seal a document containing “portions that more than one party bears the burden of showing is sealable.”

1 Dated: March 14, 2025

**PERKINS COIE LLP**

3 By: */s/ Elise Edlin*

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**Attorneys for Defendant NETFLIX, INC.**

**CERTIFICATE OF SERVICE**

I, Kate Rose, declare:

I am a citizen of the United States and employed by the firm of Perkins Coie LLP in Santa Clara County, California. I am over the age of eighteen years and not a party to the within-entitled action. On March 14, 2025, I caused to be served a true copy of the sealed version of the following documents

- **DECLARATION OF RACHAEL LAMKIN IN SUPPORT OF NETFLIX, INC.'S UNOPPOSED MOTION TO MODIFY THE SCHEDULING ORDER;**
- **EXHIBITS G-J.**

upon counsel as listed below via electronic mail:

Brendan J. Klaproth  
Klaproth Law PLLC  
2300 Wisconsin Ave NW, Suite 100A  
Washington, DC 20007  
BKlaproth@klaprothlaw.com

Plaintiff Valjakka, who is presently not represented by counsel, has been served copies of this Motion the supporting declaration of Elise Edlin, and the proposed order. Because Mr. Valjakka is a sender and/or recipient of the emails AiPi identified as Confidential that are the subject of this Motion, Netflix is also serving the materials discussed in the bullets above on Mr. Valjakka.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 14, 2025.

/s/ Kate Rose  
Kate Rose